## Case 1:22-cr-00684-JLR Document 72 Filed 12/21/23 Page 1 of 1



## **U.S. Department of Justice**

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

December 20, 2023

**BY ECF** 

The Honorable Jennifer L. Rochon United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007 Motion GRANTED.

Dated: December 21, 2023

New York, New York

SO ORDERED.

JENNIEER L. ROCHON United States District Judge

Janifer Rochon

Re: United States v. Bevelyn Williams and Edmee Chavannes, 22 Cr. 684 (JLR)

Dear Judge Rochon:

The Government respectfully writes, jointly with the defense, to request a modification to the schedule of pretrial submissions in the trial in the above-referenced case, which is scheduled for February 12, 2024. Pursuant to the Court's order dated October 27, 2023, the parties will submit joint requests to charge, voir dire and verdict form and respective motions *in limine* on January 5, 2024. With respect to the production of a witness list and exhibit list, the parties have conferred and jointly propose that the Government produce material pursuant to 18 U.S.C. § 3500 and *Giglio v. United States*, 405 U.S. 150 (1972) on January 29, 2024, with rolling productions to follow. Pursuant to the Court's Individual Rules of Practice in Criminal Cases, Section 6(B), the parties will then also provide exhibits and an exhibit list to the other party and the Court on the same date (January 29, 2024). The parties anticipate that they may supplement their exhibit lists as they continue to prepare for trial.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney for the Southern District of New York

By:

Jamie Bagliebter

anuka

Assistant United States Attorney

(212) 637-2236

CC: Defense Counsel (by ECF)